

From: [Jeffrey Delapena](#)
To: [Sam Crummett-Battle Ground](#)
Cc: [Oliver Orjiako](#); [Jose Alvarez](#); [Rebecca Messinger](#)
Subject: FW: Letter from City of Battle Ground
Date: Friday, April 24, 2026 1:32:00 PM
Attachments: [image001.png](#)
[Clark County Letter April 24, 2026.pdf](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)

Good day, Sam,

Thank you for providing the City of Battle Ground's comments regarding the Council Hearing to select the Preferred Alternative for the 2025 Comprehensive Plan.

I have included Rebecca Messinger from the Council's Office to distribute this to the Council. This will also be added to the Comprehensive Plan Index of Record.

Best regards,



Jeff Delapena
Program Assistant
COMMUNITY PLANNING

564.397.4558



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From: Sam Crummett <sam.crummett@cityofbg.org>
Sent: Friday, April 24, 2026 12:29 PM
To: Oliver Orjiako <Oliver.Orjiako@clark.wa.gov>; Jose Alvarez <Jose.Alvarez@clark.wa.gov>; Jeffrey Delapena <Jeffrey.Delapena@clark.wa.gov>
Cc: Kristin Lehto <Kristin.Lehto@cityofbg.org>; Kris Swanson <Kris.Swanson@cityofbg.org>
Subject: Letter from City of Battle Ground

EXTERNAL: This email originated from outside of Clark County. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hello Oliver, Jose, Jeff,

Please include the attached letter into the Record for the April 27 hearing before the Clark County Council.

Thank you,
Sam



SAM CRUMMETT, AICP

Planning Supervisor

City of Battle Ground

109 SW 1st Street | Battle Ground, WA 98604

360.342.5042 (office)

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City of Battle Ground

Community Development Department
109 SW 1st Street, Suite 127, Battle Ground, WA 98604
360.342.5047

April 24, 2026

Honorable County Council,

Sue Marshall, Chair
Glen Yung
Michelle Belkot
Wil Fuentes
Matt Little

On behalf of the City of Battle Ground, please accept the following supplemental testimony regarding the Comprehensive Plan Update. We previously submitted letters on January 7, January 29, and public testimony from Mayor Overholser. Summarized in this letter are items we would like to highlight since the January 29 Clark County Planning Commission recommendation.

Support Alternative 2, with minor amendments

Battle Ground continues to be supportive of Growth Alternative 2 as represented in the Draft Environmental Impact Statement (DEIS), along with the minor amendments pertaining to Battle Ground, as requested in our January 7 letter. The requested modifications are related to City infrastructure and utility needs:

1. The first modification request would add three parcels: 226938000 (Miller), 226943000 (Haldeman), and 226988000 (Newell) into the proposed Urban Growth Area (17.04 total acres). These parcels would be designated as Low-Density Residential.
2. The second request would add parcel 229197000 to the City's UGA (35 acres) (Figure 3). This is a City of Battle Ground-owned parcel containing the City's water reservoirs. Including this property would create efficiencies in decision-making and permitting.

Further justification for these amendments is expressed in our January 7 letter.

Maintain the Dollars Corner UGA Expansion

Since the January 29, 2026, Clark County Planning Commission hearing, a few residents in the Dollars Corner Expansion Area expressed a desire to be excluded from the proposed Urban Growth Area (UGA).

Below are some facts and opinions from the City of Battle Ground:

- The residents live in the area NE 228th Street and NE 226th Court.
- A petition signed by several property owners has been circulated requesting to be removed.
- Since the close of our public hearing to Council in December of 2025, the City is no longer accepting public comments.
- Battle Ground's Planning Commission & City Council have unanimously recommended the boundary expansion as presented.
- We are following our adopted public participation plan and coordinating closely with the County's DEIS process.
- Battle Ground has been planning for this expansion for 5 years, with an extensive study that occurred in 2021. The Battle Ground Land Use Master Plan, which should be included in the Record and referenced here:
<https://www.cityofbg.org/DocumentCenter/View/8441/Battle-Ground-Land-Use-Master-Plan>
- The primary goal of the Land Use Master Plan was to set us up for success in the current Comprehensive Planning effort. The GMA requires, "as part of this planning process, each city within the county must include areas sufficient to accommodate the broad range of needs and uses that will accompany the projected urban growth including, as appropriate, medical, governmental, institutional, commercial, service, retail, and other nonresidential uses" (RCW 36.70A.110 (2)).
- We inventoried land for job growth over the next 20 years, and we inventoried all land inside the City, and outside – north, south, east, and west. Growing westward is the best solution.
- Environmentally, it is also the right thing to do. We are not expanding to the north to avoid impacts to the East Fork of the Lewis River. We are not expanding to the south to avoid impacts to the Salmon Creek greenway. We are not expanding to the east

because these are the foothills of the Cascade Mountain Range, better suited for farm and forestry use.

- Friends of Clark County and some residents have raised concerns about how Battle Ground would protect Mill Creek and other environmental features in this area. If this area is brought into Battle Ground through an annexation, our critical area regulations would be in place. The City would also likely undertake a sub-area plan, which would include identifying existing environmental features and appropriate protections.
- Battle Ground requests maintaining the requested UGA boundary as presented in Alternative 2, and avoid creating a notch for a few residents.
 - If this exception is made, other property owners may want to opt out as well – then we start creating a donut hole.
 - Our goal is to create linear boundaries to more efficiently provide for City services and utilities, once the area is annexed.
 - The boundary proposed by the City, north of SR 502, follows the underlying County RC-1 district.
 - If this area is excluded, where and how do we make up for this loss in jobs and land? It puts us back to the drawing board at a time when we are behind schedule under GMA timeframes.

Remove the Portion of Meadow Glade

As part of our Alternative 2 request, we are proposing removing 330 acres from our current UGA referenced as the “Meadow Glade Area,” to help justify our Dollars Corner expansion request. This justification is expressed in the City’s 2021 Land Use Master Plan, directly tied to planning requirements under the Growth Management Act (RCW 36.70A.110).

Reason for removal can be summarized here:

- Removing this residential area will help focus residential growth more compactly into the rest of Battle Ground’s planning area.
- Battle Ground’s Community Vision and Strategic Action Plan calls for a “Town & Country” atmosphere. Keeping this area more rural in character, but next to the City, helps fulfill that vision.
- When we did our public outreach, we found that most residents in this area did not have a desire to be brought into the City. We honored that public sentiment.
- This area is heavily parcelized into primarily large lots with residential homes. It’s difficult to convert these areas into urban densities.

- This could be revisited in a future periodic review process, 10 or 20 years out. The present sentiment is to keep things status quo in this area.

On January 29, 2026, the Clark County Planning Commission recommended that the City should not remove the Meadow Glade area, but to keep it in our UGA.

The recommendation appeared ad hoc and is not based on fact. It was stated that the City of Battle Ground has infrastructure in this area and it does not want to maintain it. The City does not have any infrastructure in this area. Clark Regional Wastewater District has waste water STEP system in this area, but this is not the City's system. This may have been a reason for the misunderstanding.

Included with this letter are some key maps for reference.

Battle Ground recommends motion on behalf of Battle Ground along the lines of, ***"I move to recommend growth Alternative 2 for the City of Battle Ground, as expressed in their January 7, January 29, and April 24, 2026, letters to Clark County, including the requested minor map amendments."***

Thank you for your attention to these important decisions and for the opportunity to provide further comment.

Sincerely,



Sam Crummett
Planning Supervisor, AICP

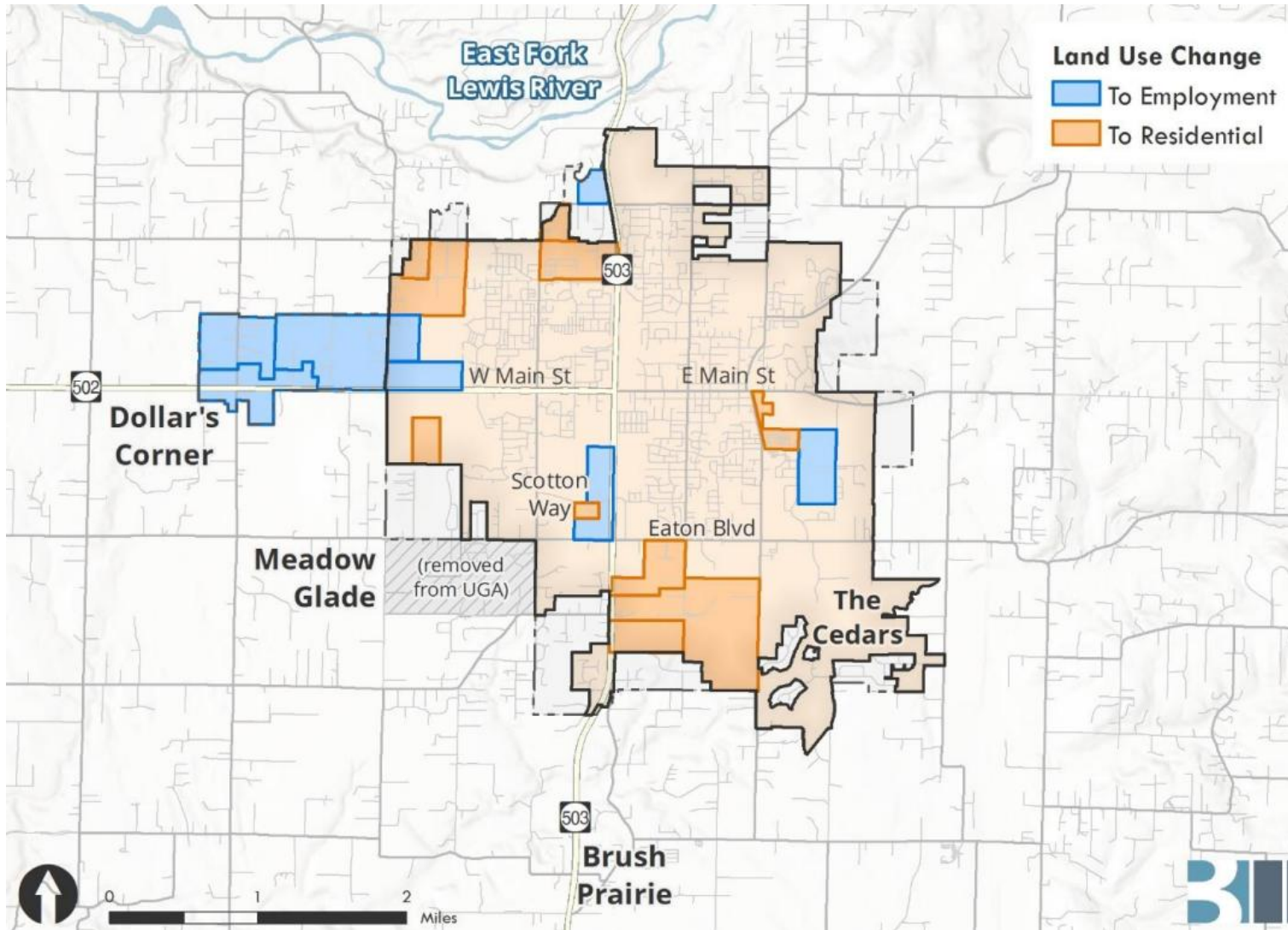
Attachment: Maps

A full copy of Battle Ground's Draft Plan may be found here:

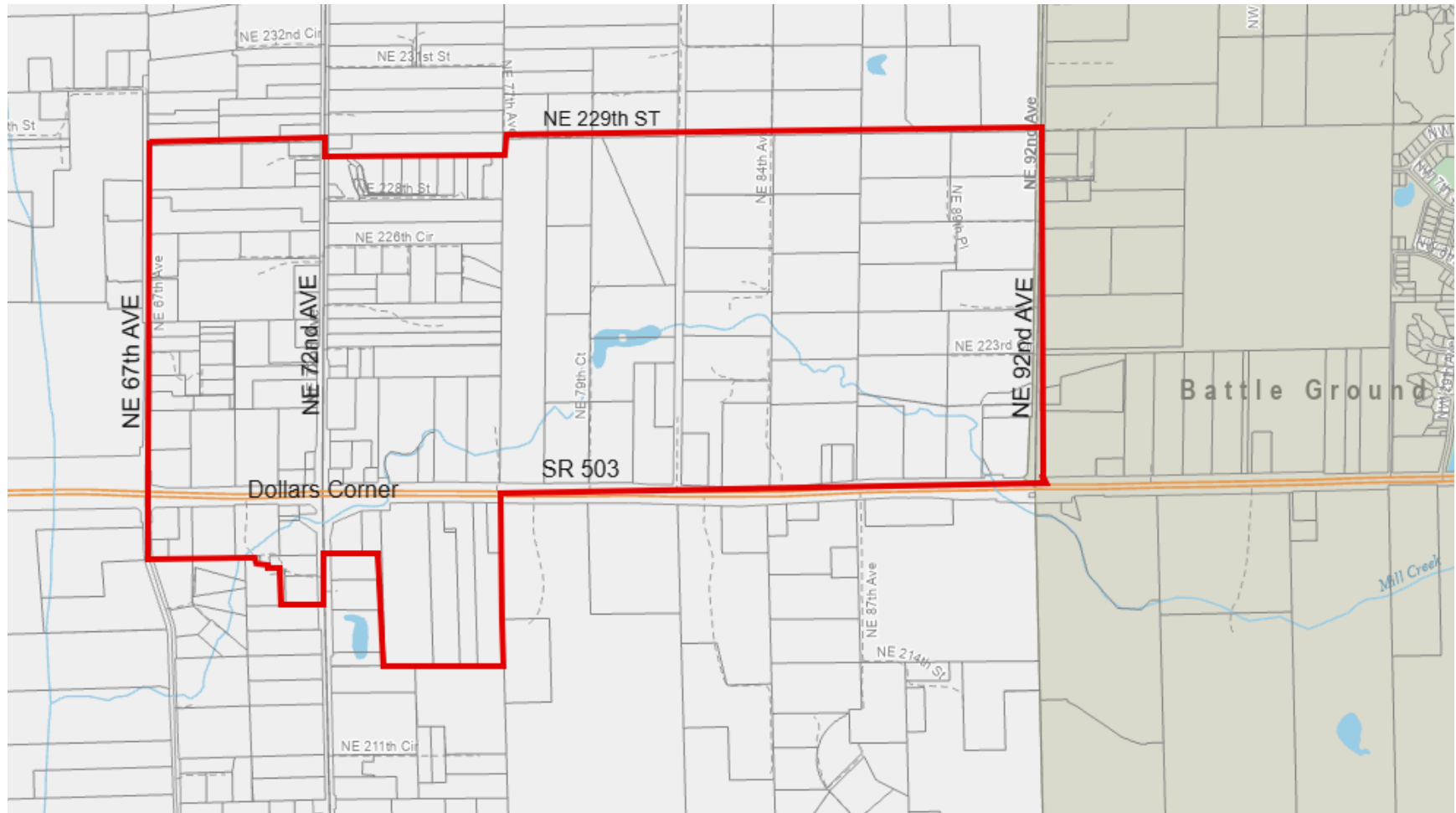
<https://cityofbg.box.com/s/2l7tt8hl4pyezwphfkr78joz883uvg7f>

Battle Ground's Dollars Corner Expansion Maps

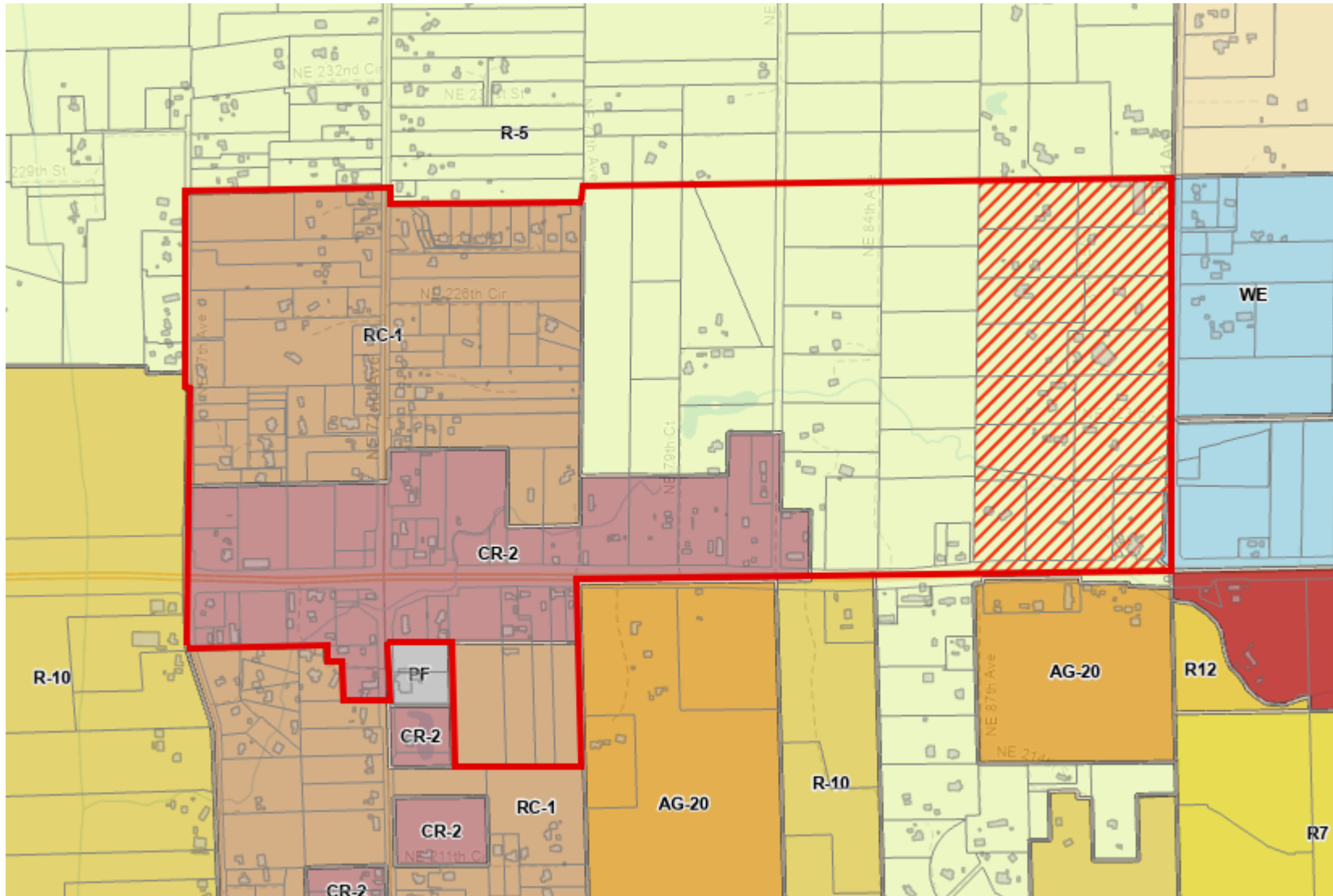
Big Picture Map



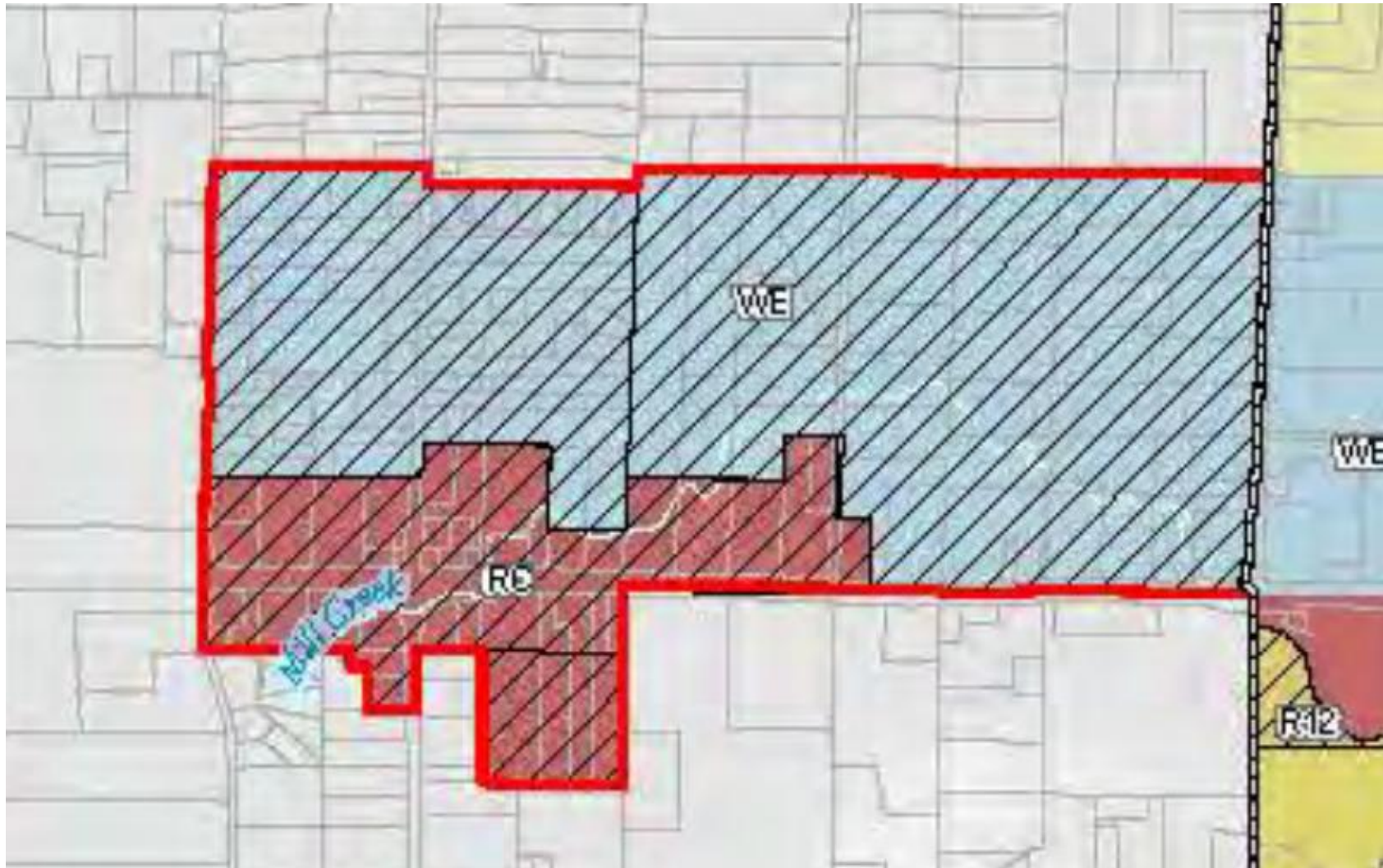
Base Map and Streets for Dollars Corner Expansion Area



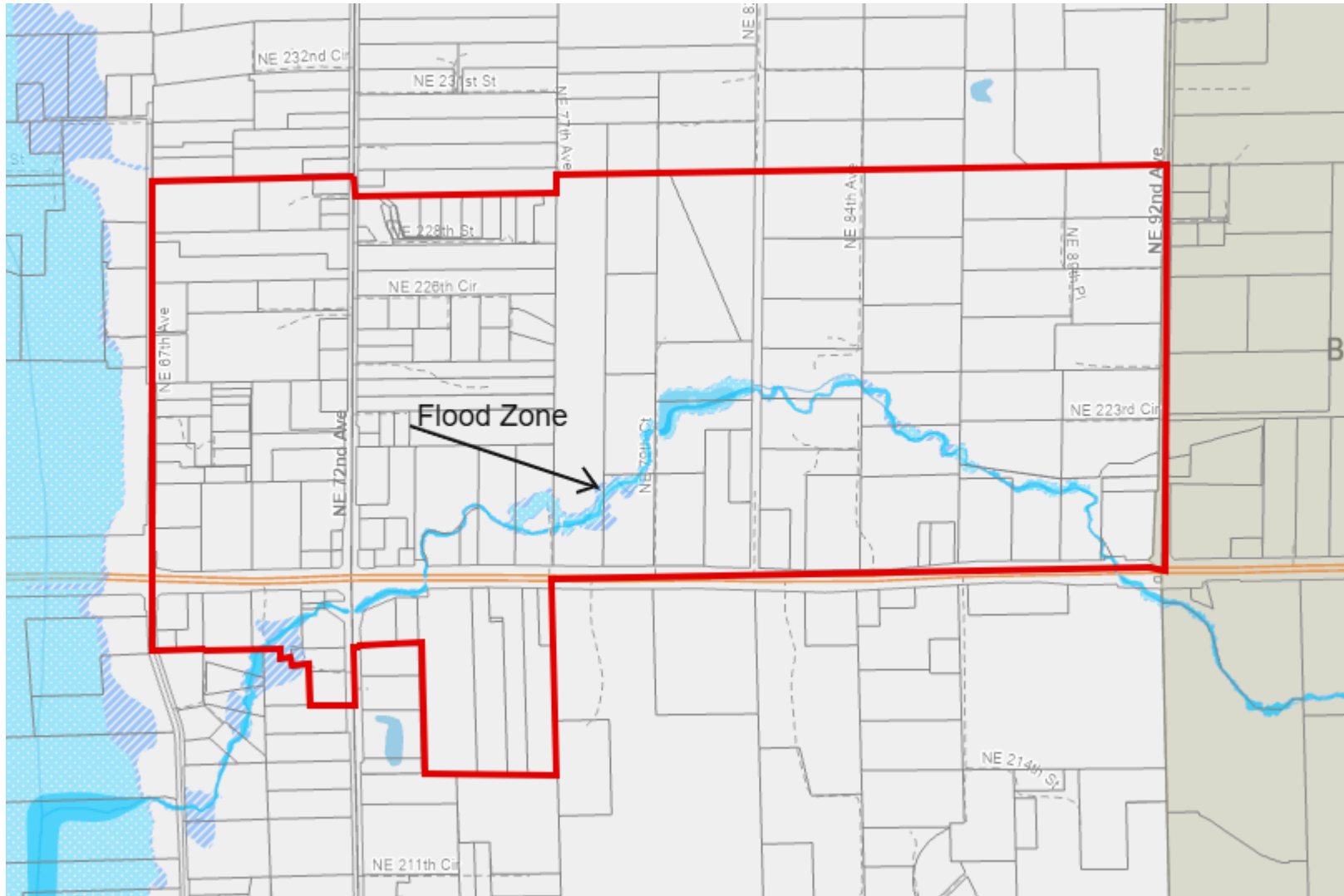
Current County Zoning



Future City Zoning (Westside Employment and Regional Commercial)



Flood Zones (Mill Creek)



Wetlands Indicator Map

